

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>MICHAEL P. AND SHELLIE GILMOR,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:10-cv-00189-ODS</b>
	)	
<b>PREFERRED CREDIT CORPORATION,</b>	)	
<b>et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' SUGGESTIONS IN RESPONSE TO PLAINTIFFS'  
MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY**

Responding Defendants,<sup>1</sup> through counsel, respectfully suggest to the Court that they do not oppose Plaintiffs' motion for extension of time to complete discovery ("Motion"). The parties have been diligently completing discovery in this matter and have agreed as to all remaining discovery to be completed. Responding Defendants further understand that an accommodation has been reached between Plaintiffs and Deutsche Bank National Trust Company regarding a 30(b)(6) deposition. Responding Defendants and Plaintiffs have also discussed and agreed that the deposition of a single expert witness identified by Responding Defendants will need to occur in September. The parties have thus identified all remaining discovery issues and agreed to a mechanism for satisfactorily addressing all of them. Responding Defendants therefore agree the extension requested in the Motion is appropriate so

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<sup>1</sup> The Responding Defendants are Impac Mortgage Holdings, Inc., Impac Funding Corporation, Impac Secured Assets Corp., IMH Assets Corp, Wells Fargo Bank, N.A., LaSalle National Bank, Impac Real Estate Asset Trust Series 2006-SD1, and Wingspan Portfolio Advisors, LLC.

that the parties can complete the specified depositions. The requested extension will have no bearing on any other deadlines.

Respectfully submitted,

August 22, 2012

/s/ Barry L. Pickens

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*Attorneys for Defendants Impac Mortgage Holdings, Inc., Impac Funding Corporation, Impac Secured Assets Corp., IMH Assets Corp, Wells Fargo Bank N.A., in its capacity as former trustee of a certain trust, LaSalle National Bank, in its capacity as former trustee of a certain trust, and Impac Real Estate Asset Trust Series 2006-SD1, and Wingspan Portfolio Advisors, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2012, the foregoing was filed using the Court's CM/ECF system, which will notify all registered parties of the filing.

/s/ Barry L. Pickens